

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

K.O.D.,

Plaintiff,

v.

No. 1:25-cv-00391

KRISTI NOEM, Secretary of the Department
of Homeland Security; and

TODD LYONS, Acting Director of the
Immigration and Customs Enforcement,

Defendants.

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER
(ORAL ARGUMENT REQUESTED)

Pursuant to Federal Rule of Civil Procedure 65 and Section 705 of the Administrative Procedure Act, 5 U.S.C. § 705, and Counts 1 and 2 of Plaintiff's Complaint for Declaratory and Injunctive Relief – and for the reasons stated in the accompanying memorandum, declaration, and all pleadings filed – Plaintiff respectfully moves this Court to issue a temporary restraining order (i) enjoining Defendants from terminating Plaintiff's F-1 student status under the Student and Exchange Visitor (SEVIS) system and (ii) requiring Defendants to set aside their termination determination. The grounds for this motion are set forth in Plaintiff's accompanying memorandum of law in support of his motion.

Plaintiff also moves this Court for an order waiving the requirement for bond or security.

Respectfully submitted,

**AMERICAN CIVIL LIBERTIES UNION OF
NEW MEXICO**

/s/ Rebecca Sheff

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, a true and exact copy of the foregoing was served via certified mail upon Defendants as follows:

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